

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

CROSSROADS SYSTEMS, INC.,	§	
	§	
Plaintiff,	§	
	§	C.A. NO. 1:13-CV-00800-SS
v.	§	
	§	JURY DEMANDED
DOT HILL SYSTEMS CORP.,	§	
	§	
Defendant.	§	
<hr/>		
v.	§	
	§	
ORACLE CORPORATION,	§	C.A. NO. 1:13-CV-00895-SS
	§	
Defendant.	§	JURY DEMANDED
<hr/>		
v.	§	
	§	
HUAWEI TECHNOLOGIES CO., LTD.,	§	
HUAWEI ENTERPRISE USA, INC., and	§	
HUAWEI TECHNOLOGIES USA, Inc.,	§	C.A. NO. 1:13-CV-01025-SS
	§	
Defendants.	§	JURY DEMANDED
<hr/>		
v.	§	
	§	
CISCO SYSTEMS, INC.,	§	C.A. NO. 1:14-CV-00148-SS
	§	
Defendant.	§	JURY DEMANDED
<hr/>		
v.	§	
	§	
NETAPP, INC.,	§	C.A. NO. 1:14-CV-00149-SS
	§	
Defendant.	§	JURY DEMANDED
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v.	§	
	§	
QUANTUM CORPORATION,	§	C.A. NO. 1:14-CV-00150-SS
	§	
Defendant.	§	JURY DEMANDED

**DECLARATION OF JOHN L. ADAIR IN SUPPORT OF  
PLAINTIFF CROSSROADS SYSTEMS, INC.'S POST-HEARING MARKMAN BRIEF**

I, John L. Adair, make the following declaration based on my own personal knowledge and, if called to testify before the court, could and would testify as follows:

1. I am an attorney with the law firm of Sprinkle IP Law Group, PC and counsel for Plaintiff Crossroads Systems, Inc. ("Crossroads") in the instant action.

2. Attached hereto as Exhibit A is a true and correct copy of pages from the Brief In Support of Defendants' Proposed Claim Constructions from the matter styled *Crossroads Systems, Inc. v. 3Par, Inc., et al*, No. 1:10-CV-00652-SS (W. D. Tex.) cited in Crossroads' Post-Hearing Markman Brief.

3. Attached hereto as Exhibit B is a true and correct copy of pages from Defendants' Preliminary Proposed Construction of Claim Terms, Phrases, and Clauses cited in Crossroads' Post-Hearing Markman Brief.

4. Attached hereto as Exhibit C is a true and correct copy of pages from the Transcript of the August 11, 2014 Deposition of John Levy, Ph.D. cited in Crossroads' Post-Hearing Markman Brief.

5. Attached hereto as Exhibit D is a true and correct copy of pages from the April 3, 2006 report of Dr. Randy H. Katz in the matter styled *Crossroads Systems (Texas), Inc. v. Dot Hill Systems Corporation*, No. A-03-CV-754-SS (W.D. Tex.) cited in Crossroads' Post-Hearing Markman Brief.

6. Attached hereto as Exhibit E is a true and correct copy of United States Patent No. 5,941,972 including *Ex Parte* Reexamination Certificate.

7. Attached hereto as Exhibit F is a true and correct copy of pages from the Jury Charge (Dkt. 131) issued in the matter styled *Crossroads Systems, Inc. v. Chaparral Network*

*Storage, Inc.*, No. A 00-CA-217-SS (W.D. Tex.) cited in Crossroads' Post-Hearing Markman Brief.

8. Attached hereto as Exhibit G are true and correct copies of demonstrative slides presented by Crossroads at the Markman Hearing and cited in Crossroads' Post-Hearing Markman Brief.

9. Attached hereto as Exhibit H is a true and correct copy of pages from the Report and Recommendations of the Special Master Regarding United States Patents Nos. 5,941,972 and 6,425,035 B2 issued in the matter styled *Crossroads Systems (Texas), Inc. v. Dot Hill Systems Corporation*, No. A-03-CV-754-SS (W.D. Tex.) cited in Crossroads' Post-Hearing Markman Brief.

10. Attached hereto as Exhibit I are true and correct copies of demonstrative slides presented by Crossroads during the examination of Dr. John Levy at the Markman Hearing.

11. Attached hereto as Exhibit J are true and correct copies of demonstrative slides presented by Crossroads during the cross-examination of Dr. Randy Katz at the Markman Hearing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 25th day of November, 2014 at Austin, Texas.



John L. Adair